

Exhibit A

CONFIDENTIAL
BRIAN HEWITT - 11/9/2013

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

EAGLE HARBOR HOLDINGS, LLC,)	
and MEDIUSTECH, LLC,)	
)	
Plaintiffs,)	
)	
v.)	No. 3:11-cv-05503-BHS
)	
FORD MOTOR COMPANY,)	
)	
Defendant.)	

Videotape Deposition Upon Oral Examination
of
BRIAN HEWITT

* * * CONFIDENTIAL * * *

Taken at 1201 Third Avenue, Suite 3800
Seattle, Washington

DATE: Tuesday, November 19, 2013

REPORTED BY: Ronald L. Cook

CCR, RMR, CRR

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1 Q. Since the time that Eagle Harbor first
2 decided to sue Ford, prior to 2010, have any e-mails
3 or other documents been destroyed?

4 A. Not that I'm aware of, no.

5 Q. When was the last time that you're aware
6 of when e-mails would have been deleted?

7 A. I'm not aware of e-mails ever being
8 deleted other than spam or perhaps newsletters.

9 Q. Does the same apply to documents,
10 electronic or otherwise?

11 A. Yes.

12 Q. Were Medius employees notified of an
13 obligation to preserve documents in connection with
14 this case?

15 A. Yes.

16 Q. Which employees were notified?

17 A. All employees. I can -- happy to list
18 them off if you like.

19 Q. Please do so.

20 A. Dan Preston, Sam Hemingway, Gina Manos,
21 Joe Preston, Jeff Harmes, David Marsing, Tom Manos,
22 Ken Schofield, and myself.

23 Q. Those are all of Medius's employees?

24 A. At this time that -- yes. There may have
25 been other employees in the company from the time the